

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
 :  
 **v.** : **DATE FILED:** \_\_\_\_\_  
 :  
 **MICHAEL DELBUONO** : **VIOLATIONS:**  
 :  
 : **21 U.S.C. § 841(a)(1) (Possession with**  
 : **intent to distribute heroin - 1 count).**  
 : **Notice of additional factors.**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about April 8, 2004, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**MICHAEL DELBUONO**

knowingly and intentionally possessed with the intent to distribute a mixture or substance  
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

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**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

\_\_\_\_\_1. In committing the offense charged in Count One of this indictment, defendant

**MICHAEL DELBUONO**

knowingly and intentionally possessed with the intent to distribute a total of approximately 37.75 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney